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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 LINDA KAUFMAN, individually and on behalf
12 of all others similarly situated,
13 Plaintiff,
14 v.
15 NORTHWELL HEALTH, INC. and PERRY
16 JOHNSON & ASSOCIATES, INC.,
Defendants.

CASE NO.: 2:23-cv-01935

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF LINDA KAUFMAN'S
COMPLAINT**

(FIRST REQUEST)

Plaintiff Linda Kaufman, individually and on behalf of all others similarly situated, (“Plaintiff”) and Defendants Perry Johnson & Associates, Inc. (“PJ&A”) and Northwell Health, Inc. (“Northwell” and, collectively with PJ&A, “Defendants”) stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff’s complaint in the above-captioned action (the “Complaint”) until **March 1, 2024**.

Plaintiff filed the Complaint on November 21, 2023 and served PJ&A on November 28, 2023. Northwell executed a waiver of service that was entered on November 28, 2023.

On December 8, 2023, a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C.

1 § 1407 (the “Motion”) was filed in the Judicial Panel on Multidistrict Litigation (“JPML”). *See In
2 re Perry Johnson & Associates Medical Transcription Data Security Breach Litigation*, Case MDL
3 No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the potential consolidation
4 and transfer of at least forty-five related putative class action complaints. The JPML heard oral
5 arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
9 included as Appendix A. As nearly every party has agreed that centralization is proper, the primary
10 question for the JPML is *where* to centralize the cases, not *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of
12 time for this deadline. The parties respectfully submit that there is good cause for this extension and
13 the requested extension is not for the purpose of delay.

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16 IT IS SO STIPULATED.

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1 Dated: January 26, 2024.

2 SNELL & WILMER LLP

3 By: /s/ Alex L. Fugazzi

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18 Counsel for Defendant Northwell
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19 *pro hac vice forthcoming

20 Dated: January 26, 2024.

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Dated: January 26, 2024.

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IT IS SO ORDERED.



U.S. MAGISTRATE JUDGE

Dated: January 29, 2024